

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

KTRV LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10601 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON MAY 15, 2025 AT 9:30 A.M. (ET)**

**THIS HEARING WILL BE CONDUCTED BY ZOOM. PARTIES AND WITNESSES ARE PERMITTED, BUT NOT REQUIRED, TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.**

**TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT [WWW.DEB.USCOURTS.GOV](http://WWW.DEB.USCOURTS.GOV) OR CLICK THE BELOW LINK:**

**<https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>**

**PARTIES ARE REQUIRED TO REGISTER FOR THE HEARING NO LATER THAN 4:00 P.M. (ET) ONE BUSINESS DAY BEFORE THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

**AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.**

**MATTERS GOING FORWARD:**

1. Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Superpriority Claims, and (D) Grant Adequate Protection; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed May 12, 2025; [Docket No. 239](#)].

Objection Deadline: At the hearing.

Objection/Response(s) Received:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with each the last four digits of each Debtor's tax identification number, are as follows: KTRV LLC (9993), Heritage Coal & Natural Resources, LLC (8326). The Debtors' service address is 1521 Concord Pike, Suite 201, Wilmington, DE 19803.

- A. [SEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 10, 2025; Docket No. 87].
- B. [UNSEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 15, 2025; [Docket No. 101](#)].
- C. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 29, 2025; [Docket No. 172](#)].
- D. Objection of Allegany Land and Coal Company to the Fifth Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed May 13, 2025; [Docket No. 242](#)].

Related Documents:

- A. Debtors' Motion for Entry of Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed March 30, 2025; [Docket No. 14](#)].
- B. Declaration of Brian Ryniker in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Filed March 31, 2025; [Docket No. 15](#)].
- C. Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 2, 2025; [Docket No. 57](#)].
- D. Second Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 17, 2025; [Docket No. 132](#)].
- E. Third Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II)

Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 23, 2025; [Docket No. 153](#)].

- F. Declaration of Brian Ryniker, Chief Restructuring Officer In Support Of The Debtors Motion For Approval Of Settlement With Bedrock Industries Investco 1 LLC And Motion For Approval Of Postpetition Financing And Use Of Cash Collateral [Filed May 2, 2025; [Docket No. 192](#)].
- G. Fourth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered May 5, 2025; [Docket No. 205](#)].
- H. Fifth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered May 9, 2025; [Docket No. 234](#)].
- I. Debtors' Motion for Entry of an Order Shortening the Notice Period with Respect to the Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Superpriority Claims, and (D) Grant Adequate Protection; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed May 12, 2025; [Docket No. 240](#)].
- J. Order Shortening the Notice Period with Respect to the Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Superpriority Claims, and (D) Grant Adequate Protection; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Entered May 13, 2025; [Docket No. 241](#)].

Status: On May 9, 2025, the Court entered a fifth interim Order approving the use of cash collateral. The Debtors are seeking expedited consideration for approval of postpetition financing and use of cash collateral. This matter is going forward.

*[Signature to Follow]*

Dated: May 13, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman

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in Possession*